

The Tavistock and Portman

NHS Foundation Trust

Student Reasonable Adjustments Policy and Procedure

Key points

This policy establishes the Trust's framework for providing reasonable adjustments to students with disabilities (as defined by the Equality Act) or experiencing pregnancy or menopause-related symptoms that may impact their studies. Key elements include:

- A 'yes first' approach that prioritises implementing adjustments quickly, even before formal documentation is complete
- Student Accessibility Passports that create portable records of adjustments throughout a student's academic journey
- Pre-approved standard adjustments that streamline the process for common needs
- Reasonable Adjustment Panels for complex cases requiring multi-stakeholder input
- Clear procedures for urgent situations such as mental health crises
- Comprehensive confidentiality protections with information shared only on a need-to-know basis
- Integration of Universal Design principles and the Trust's values of excellence, inclusivity, compassion and respect

The policy applies to all postgraduate taught, postgraduate research, and Tavistock Certificate students, ensuring compliance with the Equality Act 2010 whilst maintaining academic and professional standards.

Type:	Policy & Procedure					
Version:	7.0					
Key changes since last version:	Introduced 'yes first' approach enabling immediate implementation of adjustments before formal documentation					
	Added Student Accessibility Passports replacing previous Statement of Reasonable Adjustments					
	Expanded scope to explicitly include pregnancy and menopause-related symptoms					

	Established pre-approved standard adjustments list for streamlined processing					
	Added Reasonable Adjustment Panel for complex cases					
	Enhanced provisions for urgent situations and mental health crises					
	Strengthened digital accessibility requirements and Universal Design principles					
	Incorporated Trust Values as foundational principles					
	Updated legal compliance following EHRC Higher Education guidance note					
	Simplified student responsibilities and clarified staff obligations					
	Added constructive knowledge provisions for staff awareness of student needs					
	Restructured policy sections for improved clarity and accessibility					
Bodies consulted:	Students, Student Experience Sub-Committee, Course Teams, Education and Training Committee, Disabled Student & Trainee Group, Education & Training Senior Leadership Team					
Approved by:	Student Experience Sub-Committee					
Date approved:	23 July 2025					
Lead manager:	Student Support & Engagement Manager					
Responsible director:	Chief Education and Training Officer/Dean of Postgraduate Studies					
Ratified by:	Policy Approval Group					
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Reasonable Adjustments Policy and Procedure

1 Introduction

The Tavistock and Portman NHS Foundation Trust (the Trust) is committed to being inclusive and accessible to all students in all aspects of the academic and social life of the Trust. The Trust's values are:

We strive for **excellence**We champion **inclusivity**We place **compassion** at our core
We have **respect** for each other

To be truly excellent, we must have, and value, diverse voices in our student body, and provide an inclusive, compassionate and respectful environment for all students.

This policy and procedure provide a framework for the effective implementation of reasonable adjustments.

They are also intended to meet our obligations under the Equality Act 2010 and to ensure we provide a safe and effective learning environment for all students studying at the Trust.

2 Purpose

The purpose of this policy and procedure is to:

- Set out the Trust's stance on disability, in relation to equality, diversity and inclusion;
- Inform students about how to access support for individual support requirements and how to request reasonable adjustments;
- Provide students with opportunities to participate in, positively engage with, and succeed in all aspects of their course of study and research, benefit from being a member of the Tavistock and Portman NHS Foundation Trust community and obtain the award for which they are registered;
- Support members of Tavistock and Portman staff to carry out their duties effectively and in compliance with legislation;

- Outline the steps for the effective implementation of reasonable adjustments; and
- Inform students about how to appeal a decision made in relation to reasonable adjustments.

3 Scope

- 3.1 This policy and procedure apply to all applicants who have accepted an offer to study at, and students who are registered on, a postgraduate taught, postgraduate research, or Tavistock certificate course, and those pursuing modules on a full- or part-time basis, with the Trust at any site of delivery.
- 3.2 This policy and procedure does not apply to participants on digital and short courses or attending conferences/events. These are covered by the Digital and Short Courses Disabled Students Policy.
- 3.3 This policy will be followed by all staff and students at the Trust, at any site of delivery.
- 3.4 The Student Reasonable Adjustments Policy and Procedure has a particular relevance to students with:
 - Disabilities;
 - Physical and sensory impairments;
 - Mental health conditions;
 - Specific learning differences;
 - Autism spectrum condition;
 - Long-term medical conditions (defined as lasting for, or likely to last, at least 12 months);
 - Who are pregnant;
 - Who are experiencing menopause symptoms

4 Definitions

CPD: Continuing Professional Development

DA: Student Disability Adviser (formerly SDO, Student Disability Officer)

DET: Directorate of Education & Training

Disability: A physical or mental impairment that has a 'substantial' and 'long-term' negative effect on one's ability to do normal daily activities" (Equality Act 2010). Used as the legal umbrella term in this policy.

Fluctuating conditions: Physical or mental health conditions that vary in severity over time. Students should inform the Trust when their support requirements change.

Impairment: A difference in physiological or psychological function.

Long-term health condition: A condition lasting, or likely to last, at least 12 months.

Menopause/Perimenopause: Hormonal changes that may cause physical and mental symptoms affecting study. These are protected under the Equality Act 2010 through age and sex provisions.

Mental health conditions: Conditions such as depression, anxiety disorders, bipolar disorder, and obsessive-compulsive disorder.

Neurodivergence: Specific differences in neurological function that diverge from typical development patterns, including conditions such as autism, ADHD/ADD, and dyslexia, affecting how individuals process information and interact with their environment.

Neurodiversity: Refers to the concept that neurological differences are normal variations in the human genome. This term encompasses the full range of neurological functioning, including both neurotypical and neurodivergent individuals.

PEEP: Personal Emergency Evacuation Plan.

Pregnancy/Maternity: A protected characteristic under the Equality Act 2010 that may involve symptoms impacting study.

Reasonable Adjustments: Proportionate modifications to course delivery, assessment, or facilities that enable access without significantly disadvantaging other students.

Student Disability Lead (SDL): The Student Support & Engagement Manager

Social model of Disability: Framework recognizing that people are disabled by societal barriers rather than by their conditions or differences.

Specific Learning Differences (SpLD): Assessed differences in information processing, such as dyslexia or dyspraxia.

Student Accessibility Passport (SAP): A document outlining agreed reasonable adjustments for a student.

Student Support Coordinator: A role within the Student Support & Engagement Team

The Trust: The Tavistock and Portman NHS Foundation Trust, including all national centres.

Universal Design and Anticipatory Duty: Universal Design is a concept where environments, processes, systems, and policies are created with disabilities and differences in mind to avoid barriers or remove existing ones. This approach aligns with the Trust's "anticipatory duty" under the Equality Act 2010, which requires proactive identification and removal of barriers that might disadvantage disabled people before they occur, rather than responding only when individual students share disabilities. The anticipatory duty represents the legal obligation that underpins the Trust's commitment to Universal Design principles throughout its educational provision.

5 Policy Statements

This section sets out the Trust's commitments and expectations. It comprises the following headings:

- 5.1 Equality, Diversity and Inclusivity (EDI)
- 5.2 <u>Inclusive Learning and Assessment</u>
- 5.3 Sharing Information and Confidentiality
- 5.4 Physical Environment
- 5.5 Providing Reasonable Adjustments and Other Support

5.1 Equality, Diversity and Inclusion

The Trust embraces and encourages diversity, and we strive to make our services and training as accessible and inclusive as possible. We recognise the value of lived experience and understand that people with disabilities and experiencing pregnancy or menopause-related symptoms have an important and substantial contribution to make to the mental health and wellbeing of others.

The numbers of enrolled students sharing a disability is lower than the national average, and the likely cause of this is under-reporting known to happen on NHS-based courses. It is widely accepted that disabled people may not have the same opportunities to progress in education and employment.

Our intention is to be an inclusive education provider and align with our Trust Values of excellence, inclusivity, compassion and respect. We are committed to ensuring we are removing barriers to students with disabilities and/or

experiencing pregnancy or menopause-related symptoms, and to promoting representation across health and social care professional groups and roles.

5.2 Inclusive Learning and Assessment

The Trust is committed to inclusive learning practices:

- Staff must ensure students are not singled out when implementing adjustments
- Assessment design will consider diverse ways of thinking and learning
- Digital learning platforms will be accessible and compatible with assistive technologies
- Staff are expected to follow digital accessibility guidelines provided by the Digital Education Services team
- Course materials will be provided in accessible formats in advance of teaching
- Library services will provide equitable access to resources for all students

5.3 Sharing Information and Confidentiality

Please refer to our separate confidentiality statement.

The Trust is committed to protecting students' privacy while ensuring appropriate support:

- Students can share information about disabilities and pregnancy or menopause-related symptoms at any time via MyTAP or by emailing the Student Support Team (<u>DETDisability@tavi-port.nhs.uk</u>)
- Information will be shared only on a need-to-know basis with relevant staff
- Student records will be accessible only by authorised members of staff
- All communication will primarily be electronic to support accessibility
- Anonymised data may be used for quality assurance and equality monitoring
- Confidentiality may be breached only in cases of serious risk to the student or others

Students moving from other institutions must share their requirements again, as adjustments are not automatically transferred. Similarly, students moving between Trust courses may need their adjustments reviewed to ensure they remain appropriate, although they will not need to re-share information already shared.

Students may withdraw shared information at any point by contacting the Student Support team, which will cease related accommodations.

5.4 Physical Environment

Buildings and facilities will be maintained and updated to ensure Universal Design principles wherever possible.

Reasonable adjustments will be made to buildings and facilities, where possible and according to the requirements identified by disabled students.

Accessibility of new or refurbished sites of delivery will be assessed at the time of initial approval and during periodic reviews.

5.5 Providing Reasonable Adjustments and Other Support

The Trust will implement reasonable adjustments that enable students to succeed while maintaining academic and professional standards:

- All adjustments will consider the specific requirements of the student, the course requirements, and any competency standards.
- The Trust maintains a standard list of commonly implemented reasonable adjustments (Appendix 1) that can typically be approved without additional consultation beyond the student and Student Support team. These preapproved adjustments streamline the implementation process while meeting the needs of many students.
- In urgent situations such as mental health crises, temporary adjustments may be implemented immediately by course teams while formal processes follow.
- Adjustments may apply to teaching, assessment, physical environment, or digital resources.
- Adjustments will be documented in a Student Accessibility Passport (SAP).
- Adjustments will continue for the duration of study unless the student requests otherwise, with review if circumstances change.
- Students are not required to be reassessed each academic year unless their condition changes.
- If a student moves to a new course within the Trust, their adjustments will transfer automatically, though they may need review to ensure appropriateness for the new course requirements. Students should inform us if their Reasonable Adjustments are no longer suitable for their new course of study so that the Student Support team can work with the student and new course team to update them.
- Students returning to the Trust after a period away will be contacted to review their adjustment requirements if they have previously requested reasonable adjustments.
- When adjustments cannot fully address unexpected worsening of a condition, students may apply for Extenuating Circumstances.
- For temporary conditions not amounting to a disability, alternative support such as Late Submission or Extenuating Circumstances may be more appropriate.

The Trust cannot provide social or personal care support but will work with students to facilitate connections to appropriate services.

6 Duties and responsibilities

This section describes the duties and responsibilities of staff members and students. It comprises the following sections:

- 6.1 Tavistock and Portman NHS Foundation Trust
- 6.2 Roles and responsibilities for Staff Teams
- 6.3 Student Responsibilities

6.1 The Tavistock and Portman NHS Foundation Trust:

- Has a legal obligation to implement reasonable adjustments to support students to access their learning and provide opportunities to reach their full academic potential;
- Has a requirement to maintain academic and other core competency standards, including those set by external professional, statutory and regulatory bodies;
- Has a requirement to safeguard patients and ensure that students can safely work with patients (where this a requirement of the course);
- As far as is possible, and at the earliest opportunity, will take steps to identify any likely barriers for students with individual support requirements and aim to remove them at the earliest practicable opportunity;
- Will review reasonable adjustment requests on a case-by-case basis and will:
 - Consider how effective a reasonable adjustment would be in overcoming a disadvantage;
 - o Review the efficacy and/or practicability of the proposed adjustment;
 - Evaluate the likely financial and other costs incurred through the implementation of the reasonable adjustment; and
 - Assess the extent of unreasonable disruption that implementing a reasonable adjustment could have.
- Aims to implement the reasonable adjustment as far as reasonably practicable, and will convene a Reasonable Adjustment Panel to support consideration of complex requests. See: Student Reasonable Adjustment Panel;
- Has an anticipatory duty to make reasonable adjustments and make advances to remove barriers for disabled students and/or students experiencing pregnancy or menopause-related symptoms;
- Will take steps to remove, alter or provide means of avoiding physical barrier/s that place disabled students at a substantial disadvantage compared to students who are not disabled;
- Where it is reasonable to do so, will provide auxiliary aids or services where, without such aids, students with individual support requirements would be at a substantial disadvantage when compared to students who are not disabled'
- Will consider adjustments to assessments or the provision of alternative assessments to ensure that students with support requirements do not experience a substantial disadvantage in demonstrating that they have achieved the learning outcomes for their course;

- Is committed to meeting its statutory health and safety and fire safety responsibilities and to creating a culture that is proactive in supporting the health and safety of all its members;
- Will comply with current data protection legislation including the General Data Protection regulation (GDPR) and the Data Protection Act 2018 (together UK GDPR), and the provisions of the Data Use and Access Bill 2025 as it is implemented over a period of time until June 2026 See: Privacy Policy.

6.2 Roles and Responsibilities for Staff Teams

The roles and responsibilities for the implementation of a student reasonable adjustment are as follows:

- Chief Education & Training Officer/Dean of Postgraduate Studies has
 overall responsibility for ensuring all staff within the Directorate of Education
 and Training, comply with this policy and procedure. They ensure that there
 is a designated member (or members) of staff to provide advice to students
 who share a disability, and to staff who are working with a student with
 disabilities. They adopt and promote the Disabled Student Commitment, by
 the Disabled Student Commission (<u>The Disabled Student Commitment |
 Advance HE (advance-he.ac.uk)</u>)
- Student Support and Engagement Team (Student Support Team or Student Support) has primary responsibility for working in partnership with students and can advise on individual additional support requirements and recommend appropriate reasonable adjustments required to enable students to engage with their course and wider Trust provision. The team will review any supporting evidence and the student's account of their needs. Support from the team will be available for the duration of the students' studies and whilst they are a registered student. The team holds the responsibility to inform the student's Course Lead or other relevant team within the Trust about any reasonable adjustment recommendations.
- The Course Team implements and arranges any academic reasonable adjustments supported by the Trust, regardless of the level of study. If there is a course requirement for a student to attend a placement, the Course Team has the responsibility to ascertain fitness. Course Teams will ensure that inclusive curriculum and assessment are put in place wherever possible. Course Teams have a responsibility for ensuring they are conversant with issues relating to disability, such as inclusive curriculum, learning, and assessment policies. They also have a responsibility for liaising with the Student Support Team where issues relating to disabilities arise and where reasonable adjustments are being considered.
- Academic Registry has responsibility for ensuring academic policies and quality strategies are inclusive for all disabled students and those experiencing pregnancy or menopause-related symptoms, and for promoting the principles of universal design.

- **Digital Education and Library Services** has responsibility for ensuring Digital Education Services and Library Services provide inclusive services and pursue the principles of Universal Design.
- The Trust Scheduling Team and DET Enquiries & Timetabling Officer, as far as is reasonably practical, implement a reasonable adjustment to a student's personal timetable and, if applicable, to the location of their teaching events.
- **DET Equality, Diversity and Inclusion team** have responsibility for promoting and supporting equality, diversity and inclusion across DET. They will contribute to the identification of staff development needs and provision of CPD as required. They will liaise with the Student Support & Engagement Team where appropriate. They will facilitate a Disabled Student and Trainee Group on a termly basis.
- Tavistock and Portman NHS Foundation Trust members of staff will not discriminate against any student and have a duty to follow this policy to support the Trust in meeting its legal obligations. If a student shares an individual support need or disability for the first time, or if the member of staff has a reasonable concern for a students' wellbeing (constructive knowledge), the member of staff has an obligation to inform the Student Support Team at the earliest opportunity as they are deemed to have received the information on behalf of the Trust and have a duty of care to report the student's actual or suspected disability.

6.3 Student Responsibilities

Students are expected to:

- Share information about disabilities or pregnancy or menopause-related symptoms that may affect their studies at the earliest opportunity;
- Update the Student Support team if their condition improves or worsens;
- Update the Student Support team if their Reasonable Adjustments are not effective, or become ineffective due to a change in circumstances (such as moving to a new course);
- Engage with the support process and maintain communication with the Student Support team:
- Apply for Disabled Students' Allowance (DSA) if eligible.
- Regarding lecture recordings, where approved as an adjustment students should be aware of the <u>Educational Recordings Policy and Procedure</u>. Violation of the Educational Recordings Policy and Procedure constitutes a serious breach of policy and the Terms & Conditions of Study and may result in disciplinary action, including potential exclusion from the course.
- Provide accurate and truthful information about disabilities, pregnancy or menopause-related symptoms when requesting reasonable adjustments.

Students should understand that:

- Information shared will be treated confidentially and only shared on a needto-know basis;
- Evidence of disabilities or conditions helps the Trust provide the most appropriate support;
- Not sharing information may limit the support that can be provided;
- For courses with placement requirements, sharing disabilities may be necessary to ensure safe practice;
- Submitting false or fraudulent claims or documentation constitutes a serious breach of policy and may result in action under the Student Conduct Concerns Procedure and/or Professional Suitability for Training Procedure.

7 Procedures

- 7.1 This is the procedure for how to request student reasonable adjustments. There is a more detailed Standard Operating Procedure for Reasonable Adjustments which should be followed by all staff members in conjunction with this document.
- 7.2 A student's reasonable adjustments can only be implemented once the Trust has knowledge of the student's individual support needs. For hidden disabilities, it may be difficult for the Trust to gain knowledge of the disability without the student engaging with the process of support to request reasonable adjustments. Therefore, all students are asked to carry out the following steps:
- 7.3 **Step 1**: **Sharing a disability, menopause or pregnancy symptoms:** Students can share a disability and/or pregnancy or menopause-related symptoms on the application form, enrolment form, or by logging into the student profile on the MyTAP student portal.
 - 7.3.1 Applicants who have shared an individual support requirement or a disability during the admissions process, and who have accepted an offer to study at the Trust, will be contacted by the Student Support Team at the earliest opportunity and will be asked to provide information and supporting evidence to ensure any reasonable adjustments that may be agreed can be in place as soon as reasonably possible, ideally before the start of the course.
 - 7.3.2 Students can also email the Student Support Team (DETDisability@tavi-port.nhs.uk) at any time to share their individual support need. Student Support will contact the student at the earliest opportunity.
 - 7.3.3 If a student shares their individual support need to any member of the Trust staff, the staff member is then deemed to have received the information on behalf of the Trust and has a duty of care and subsequent responsibility to report the student's sharing of an

individual support need or disability to the Student Support Team as soon as possible. The member of staff can contact the Student Support Team for further support and guidance at DETDisability@Tavi-Port.nhs.uk.

- 7.3.4 If a student requests that their information should remain confidential, this will be recognised and implemented, unless there is a significant concern that by doing so it is likely to put either the student themselves or others at risk. This will include the requirement to complete a mental health escalation plan, a Personal Emergency Evacuation Plan and/or other, which others will need to be aware of. The student will be informed by the Student Support Team that, while this does not remove the Trust's duty to provide support, it may restrict the reasonable adjustments that can be implemented. Students are encouraged to attend an appointment with the Disability Adviser or email the Student Support Team (DETDisability@Tavi-Port.nhs.uk).
- 7.4 **Step 2: Requesting Reasonable Adjustments**: The student can request Reasonable Adjustments on MyTAP via the button on their application form, enrolment form or on their MyTAP profile at any time. This process is related to, but distinct from, initially sharing a disability or pregnancy or menopause-related symptoms.

7.4.1 Evidence and Implementation Approach

The Trust operates a 'yes first' approach to providing Reasonable Adjustments. This means:

- Reasonable Adjustments will be implemented as soon as a need is identified, without waiting for formal documentation.
- This approach recognises that the Trust may have 'constructive knowledge' of a student's needs under the Equality Act 2010, even without formal diagnosis.
- Constructive knowledge may be based on staff observations of student behaviour or work, attendance patterns, self-reported difficulties, or any other indicators suggesting a disability or condition.
- In urgent situations (such as mental health crises or imminent assessments), academic staff and course leaders have authority to implement immediate temporary adjustments without waiting for the formal process.

7.4.2 Supporting Documentation

While not a prerequisite for initial adjustments, supporting documentation helps the Trust provide the most appropriate and comprehensive support:

 Students are encouraged to provide documentation by uploading it during the application/enrolment process, through

- MyTAP, or by emailing the Student Support Team at DETDisability@tavi-port.nhs.uk
- Documentation may include medical evidence, DSA reports, educational psychologist reports, or evidence of previous adjustments
- For neurodivergence such as ADHD and ASC, a referral letter from a GP along with screening test results is sufficient
- If formal diagnostic testing is required, the Trust will financially contribute to the cost of assessment
- Students are expected to provide accurate information about their needs when requesting reasonable adjustments. Where there are concerns about the accuracy of information provided, the Trust will investigate appropriately and may take action under relevant policies including student conduct procedures.
- 7.5 **Step 3:** Once a student has submitted their request for Reasonable Adjustments, they will be contacted by the Student Support Team and given the opportunity to meet with the Disability Adviser.
- 7.6 **Step 4 (Optional):** The student meets with the Disability Adviser. The student is not required to meet with the Disability Adviser; this step is optional. However, if the student is unsure about the Reasonable Adjustments required, if they require help with completing a DSA application, requesting an assessment, or would like to discuss anything on their application, they are encouraged to meet with the Disability Adviser.

7.7 Reasonable Adjustment Panel

- 7.7.1 The purpose of a Student Reasonable Adjustment Panel is to consider more complex adjustment requests that:
 - Fall outside the standard list of pre-approved adjustments
 - Involve significant costs or resource implications
 - Require coordination across multiple departments or external organisations
 - Present novel or particularly challenging implementation questions
 - Where there may be a declared conflict of interest
 - Where there is a difference of opinion between stakeholders.
- 7.7.2 The Panel will be convened by the Student Disability Lead when needed and will typically include:
 - Student Support representative
 - A director within the Directorate of Education and Training
 - Academic representative from the relevant course
 - Relevant subject matter experts (e.g., Digital Education for technology adjustments, Estates)
 - External expertise as required (e.g. external examiner).

- 7.7.3 The Panel will review all available evidence, consider the student's specific requirements in relation to their course requirements, and determine appropriate adjustments.
- 7.7.4 The Panel's recommendations will be documented and shared with the student, along with clear explanations for any adjustments that cannot be implemented.

8 Training Requirements

Student Disability Adviser(s) and/or the Student Disability Lead and/or other relevant members of staff will attend training and/or relevant conferences to keep abreast of developments and changes in the social or regulatory climate.

Continuing Professional Development (CPD) training will be provided to academic and professional services staff on this policy and associated Standard Operating Procedure for Disabled Students, at least once per year.

CPD will also be provided to DET staff on other relevant topics, such as marking assignments with an SPLD cover sheet.

All Trust staff complete regular statutory and mandatory training on Equality, Diversity and Human Rights; Information Governance including GDPR and Data Protection; Health; Safety and Welfare; and training on learning disabilities and autism.

As part of new staff induction, staff with a relevant role will be provided with training on this policy and procedure and associated Standard Operating Procedure for Disabled Students.

9 Process for monitoring compliance with this policy

Student survey feedback relating to relevant questions – the SDL will be responsible for monitoring and reporting on relevant student survey feedback.

Complaints – the SDL will be responsible for acting on any recommendations arising out of relevant student complaints relating to disabilities.

Monitoring of student numbers, take-up of reasonable adjustments and other data points.

A Key Performance Indicator on the length of time taken between sharing a disability/condition/difference and having reasonable adjustments in place will be established as part of the DET dashboard.

10 References

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Thomas, L. & May, H., 01/09/2010. Inclusive learning and teaching, London: Advance HE (Formerly Higher Education Academy).

The Disabled Student Commitment by the Disabled Student Commission: The Disabled Student Commitment | Advance HE (advance-he.ac.uk)

Advice note for the higher education sector from the legal case of University of Bristol vs Abrahart | EHRC

Social model of disability | Disability charity Scope UK

11 Associated documents¹

- Student Accessibility Passport example
- Standard Operating Procedure for Disabled Students (for internal use only)
- Marking cover sheet for students with learning difficulties (not published with this policy)

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¹ For the current version of Trust procedures, please refer to the intranet.

- Admissions Procedure
- Assessment and Marking Procedure
- Disabled Student Allowance Website: https://www.gov.uk/disabled-students-allowances-dsas
- Trust Assessment web pages
- NHS Data protection policy: https://www.england.nhs.uk/wp-content/uploads/2016/12/data-protection-policy-v4.5.pdf
- Tavistock and Portman Library Website



12 **Equality Impact Analysis**

Equality Impact Assessment (EIA) Form

Equality Impact Assessments are a tool used to assess all organisational activity including policy, strategies, plans, service delivery and practice or a decision. The general equality duty set out in the Equality Act 2010 requires public authorities, in the exercise of their functions, to have due regard to the need to:

- eliminate any form of unlawful discrimination (including direct or indirect discrimination, harassment, victimisation, and any other conduct prohibited under the Act)
- advance equality of opportunity between people who share a relevant characteristic and people who do not, and
- foster good relations between people who share a protected characteristic and people who do not.

Please refer to Equality Impact Assessment Guidance provided if you need further information.

1	Name and Job Title of person completing the	Rebecca Bouckley, Student Support & Engagement Manager
	Equality Impact Assessment	
2	Title of what you are proposing	Student Reasonable Adjustments Policy (Version 7.0)
3	What are the main objectives or aims of what you	To provide a framework for implementing reasonable adjustments for students with disabilities (as defined by
	are proposing?	the Equality Act) or experiencing pregnancy or menopause-related symptoms that may impact their studies,
		ensuring compliance with the Equality Act 2010 while maintaining academic standards.
4	Date you are completing this form	5 August 2025
5	Summary overview (What changes have you made following completion of the EIA?)	

	Stage 1: Initial Screening							
6	What evidence is available to suggest that what you are proposing will have a positive or adverse impact on people with protected characteristics or vulnerable groups? Please state how your proposed changes will / will not impact on the protected characteristic groups listed below. Please note: These groups may also experience health inequalities.							
Impact (Positive Impact, No impact, Adverse Impact)						Impact)	Evidence State below (<u>for each protected group)</u> the evidence you have used in your decision making: demographic data and other statistics including census findings,	
Protected Characteristics		Positive Impact	No Impact	Low Adverse Impact	Medium Adverse Impact	High Adverse Impact	results of consultations or engagement, research findings, surveys (internal or external), complaints and compliments, incident reports, recommendations of external investigations or audit reports. Are there any key gaps in the data, evidence and findings from published or consultation documents?	



Age Older people; middle years; early years; children and young people.	X		High – positive (with mitigation for potential negatives) Positive: Policy explicitly includes menopause-related symptoms; benefits students of all ages with menstruation-related conditions (PCOS, endometriosis, PMDD); avoids age-based assumptions; 'yes first' approach removes age-related barriers. ONS statistics show age is a significant risk factor for disability (including mobility and health conditions), so this policy particularly benefits older students who are statistically more likely to need reasonable adjustments Potential Negative Impacts: Digital-first approach may disadvantage older students who are not digital natives (did not grow up with online systems) Mitigation: Choice between in-person or online appointments, direct assistance with digital processes provided; Electronic communication supports assistive technologies, which may benefit older students with visual/hearing impairments
Disability Physical, sensory, and learning impairment; mental health condition, long-term conditions	X		High – positive Positive: Primary focus of policy; 'yes first' approach removes barriers; Student Accessibility Passports ensure continuity; addresses physical, sensory, learning, and mental health conditions comprehensively; constructive knowledge provisions protect students who haven't formally disclosed Potential Negative: Evidence requirements might create barriers for students without formal diagnoses or financial means for assessments Mitigation: Financial contribution for required assessments; multiple forms of evidence accepted; 'yes first' approach allows support before formal documentation
Gender Identity Inc. people who identify as Transgender	X		Medium Positive Impact (with safeguards) Positive: Strong confidentiality provisions protect transgender students; inclusive language benefits all gender identities; Universal Design principles create more inclusive environment Potential Negative: Medical evidence requirements might force unwanted disclosure of transition-related information; additional scrutiny during adjustment process Mitigation: Robust confidentiality protections; staff training on transinclusive practices; need-to-know information sharing only
Marriage and Civil Partnership People married or in a civil partnership		x	N/A - Policy does not differentiate based on marital status.



Pregnancy/maternity Women before and after childbirth and who are breastfeeding	X	High Positive Impact Positive: Explicitly includes pregnancy-related symptoms requiring reasonable adjustments; recognises substantial impact on study; 'yes first' approach ensures timely support Potential Negative: Students might worry about academic progression implications or stigma from peers/staff Mitigation: Confidentiality protections; staff training on supportive approaches; clear guidance that adjustments maintain academic standards
Race and Ethnicity Inc. culture, history, language, traditions, ancestry, and national origin	X	Medium Positive Impact (with potential barriers) Positive: Digital accessibility and Universal Design benefit students whose first language isn't English; electronic communication supports translation tools; inclusive approach benefits all backgrounds Potential Negative: Cultural stigma around disability disclosure in some communities; requirement for evidence in English with official translations creates financial barriers; 'constructive knowledge' might lead to cultural misunderstandings Mitigation: Cultural competency training for staff; financial support available for translations; clear confidentiality protections; sensitive approach to disclosure
Religion/belief People with different religions/faiths or beliefs, or none	X	Low Positive Impact (with cultural considerations) Positive: Flexible adjustment provisions can accommodate religious observance needs; confidentiality protections respect individual beliefs Potential Negative: Some religious communities may stigmatise certain conditions (particularly mental health); students might fear religious practices being pathologised; medical evidence requirements might conflict with faith-based healing approaches Mitigation: Cultural and religious sensitivity training for staff; multiple forms of evidence accepted; clear confidentiality provisions
Sex Women, Men	X	High Positive Impact Positive: Explicit inclusion of menopause-related symptoms particularly benefits women; menstruation-related conditions covered under disability provisions; promotes equality regardless of sex Potential Negative: Focus on female-specific conditions might inadvertently overlook male-specific health issues that could require adjustments Mitigation: Policy applies equally to all students regardless of sex; inclusive language throughout; individual assessment approach



Sexual Orientation Lesbian; Gay; Bisexual; Heterosexual, Gender-fluid	X	Medium Positive Impact (with intersectional considerations) Positive: Confidentiality provisions create safer environment for LGBTQ+ students; mental health crisis provisions may particularly benefit this group; inclusive approach reduces discrimination risk Potential Negative: Students might fear sharing due to intersectional discrimination; medical evidence from potentially unsympathetic healthcare providers Mitigation: Strong confidentiality protections; multiple forms of evidence accepted; staff training on inclusive practices; partnership with supportive healthcare providers where possible
* Vulnerable groups Populations or segments of society that are more susceptible to harm, discrimination, or disadvantage due to various factors like social, economic, or physical circumstances, requiring specific support and protection.	X	High Positive Impact (with accessibility considerations) Positive: Mental health crisis provisions; constructive knowledge requirements; flexibility of access (in-person or online); comprehensive support approach particularly benefits students with mental health conditions, carers, and those from disadvantaged backgrounds; financial support available for assessments; Potential Negative: Digital-first approach might disadvantage those with limited access to technology or internet; complex processes might overwhelm students in crisis; evidence requirements might be challenging for those with chaotic life circumstances Mitigation: Alternative communication methods; direct support available; 'yes first' approach allows immediate support; staff training on trauma-informed approaches; financial support for required documentation



7. Human Rights (1998)

Are there any Human Rights considerations, if so, please identify which aspects (Equality Impact Assessment Guidance)

Yes	
(please explain)	
No	The policy enhances rather than restricts human rights, particularly the right to education and freedom from discrimination.
	and needen non-discrimination.
Don't know	

- (a) If what you are proposing is assessed as **not having impact** Go to Section 12
- (b) If what you are proposing is assessed as **having impact** Continue to Stage 2 below.

0 1-4				Assessment Pro	
	here service user, pu iminatory, or have an				
	cteristics?		o. pool		
Please	e tick as appropriate.				
8.1		No			
8.2	(No	If 'Yes', plea	se identify and exp	olain in section 9
9	contractors) Can the adverse im	pact be i	ustified? Ple	ase provide detail	S.
		puot so j	<u> </u>	aco provido dotan	<u>. </u>
10	What arrangements	s will you	put in place	to monitor the in	pact of the proposed
	action or change?				
	Student survey feed	hack mon	itorina		
•	Complaints analysis		itoring		
•	KPI tracking on time		disclosure an	d adjustment imple	ementation
•	Annual policy review				
11	What actions will w	ou toko t		v universified imp	act and promote acuality
11	of outcome for indi	ou take to viduals f	o address an rom protecte	y unjustified impa d characteristics	act and promote equality
Actio	n	Lead	-	Timescales	Outcome(s)
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Head of Culture &	Yes	No					
Inclusion Approval?	√						
Name of Head of Culture & Inclusion	Thar	nda Mh	langa	Signature	Harry	Date of Approval	21.08.25

Please send completed EIAs form for review to: eia@tavi-port.nhs.uk

12. **Declaration**: I am satisfied that an Equality Impact Assessed has been completed.

Date: 23/09/2025

Author (name and signature): Rebecca Bouckley

Job Title: Student Support & Engagement Manager

For activities that have an impact on People or have policy implications, a final copy should also be sent to the Chief People Officer: HR@Tavi-Port.nhs.uk



Appendix 1: Standard Reasonable Adjustments

The following are the Standard Reasonable Adjustments (RAs) that are currently available for students to choose via their MyTap profile.

The standard Reasonable Adjustments that are listed below are confirmed by the Student Disability Advisor (SDA) after meeting with the student and reviewing any supporting documentation.

- Assessment Adjustments
- Assistive Software
- Captions
- Car Parking
- Extra Tutorials for Study Skills
- Plan in case of medical emergency (Medical Action Plan)
- Plan in case of mental health escalation (Mental Health Escalation Plan)
- Plan in case of emergency evacuation from the building (Personal Emergency Evacuation Plan - PEEP)
- Recording with agreement
- Room size/location
- Specialist Furniture desk/chair
- Teaching sessions move around or leave room
- Emotional and Mental Health Support
- Extenuation
- Ground floor map and guidance
- Guide Dog accommodations
- Hearing Loop & Roger
- Help with filling in forms
- Information about Proofreading
- Learning about accessibility features in software such as MS Word
- Library Braille or other book formats
- Library Information Skills and Support
- Medical Room
- Non-medical helper
- Personal Assistant
- Printing
- Quiet Space
- SPLD cover sheet
- Use of lockers
- Wheelchair access